

James E. Johnson Corporation Counsel LAW DEPARTMENT

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April 30, 2021

SO ORDERED

VIA ECF

Honorable George B. Daniels United States District Judge United States District Court Southern District of New York 500 Pearl St, New York, NY 10007 The status conference is adjourned from May 4,2021 to July 13, 2021 at 9:45 a.m.

MAY 0 3 2021

ON. CEORGE B. DANIFILS

Re: Osama Metwally v. City of New York, et al., 19-CV-8206 (GBD)

Your Honor:

I am a Senior Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, representing defendant City of New York in the above-referenced matter. The parties write respectfully to request an adjournment of the May 4th status conference and an extension of the current fact discovery deadline.

Since the time of the parties' last status report, the parties have exchanged document discovery. However, discovery in this matter has been tampered by some medical issues that plaintiff's counsel's had been dealing with as of late. Given these delays, unfortunately, additional time for discovery is necessary. Plaintiff is in the process of responding to defendant City's first set of discovery demands and anticipates that he will be able complete those responses by Monday, May 3, 2021. Thereafter, the parties will move on to depositions. The additional time requested will allow for parties to continue to gather documents and then to proceed with depositions. Accordingly, the parties respectfully request that discovery be extended from May 20, 2021 until July 30, 3021. The parties also request a corresponding adjournment of the status conference, which is presently scheduled for May 4, 2021, until a time that is convenient for the Court in June.

Thank you for your consideration herein.

Respectfully submitted,

/s/*Maria Fernanda DeCastro* Maria Fernanda DeCastro Senior Counsel

ce: Joel Martin Gluck (By ECF)
Attorney for Plaintiff